

SUPPORTING STATEMENT
FOR TITLE VI PROGRAM PERFORMANCE REPORT

1. Circumstances Making the Collection of Information Necessary

A Program Performance Report on activities under Title VI of the Older Americans Act (OAA) is necessary for the Administration on Aging (AoA) to monitor federal funds effectively and to be informed as to the progress of the programs. Grantees are required to submit an annual Program Performance Report to allow for efficient federal monitoring.

Sections 614(a)(3), 202(a)(16)(A)(i)(ii)(iii) and 207(a) of the OAA state that an applicant for a grant under Title VI Part A, Indian Program, shall “provide that the tribal organization will make such reports in such form and containing such information, as the Assistant Secretary may reasonably require, and comply with such requirements as the Assistant Secretary may impose to assure the correctness of such reports.” Section (624)(a)(4) of the OAA states that an applicant for a grant under Title VI Part B, Native Hawaiian Program, shall “provide that the organization will make such reports in such form and containing such information as the Assistant Secretary may reasonably require, and comply with such requirements as the Assistant Secretary may impose to ensure the correctness of such reports” Section 373(e)(3) of the OAA states that an applicant for a grant under Title VI Part C, Native American Caregiver Support Program shall “prepare and submit to the Assistant Secretary reports on the data and records required under paragraph (2), including information on the services funded under this subpart, and standards and mechanisms, by which the quality of the services shall be assured.” A combined Program Performance Report form is used for reporting by grantees under Parts A, B and C. The regulations at 45 CFR 92.40(b)(1) provide that “grantees shall submit annual performance reports unless the awarding agency requires quarterly or semiannual reports.” Again, we require annual reports.

AoA is submitting the Office of Management and Budget (OMB) a form for the Program Performance Report. The report is required annually as a result of consultation with tribes and to reduce the paperwork and burden on the grantees, with a 2.5 estimated preparation time per report.

2. Purpose and Use of the Information Collection

The Program Performance Report provides a data base for AoA to (1) monitor program achievement of performance objectives; (2) establish program policy and direction; and (3) prepare responses to Congress, the OMB, the General Accounting Office, other federal departments, and public and private agencies as required by the OAA Title II sections 202(a)19 and 208; and prepare data for the Federal Interagency Task Force on Older Indians established pursuant to section 134(d) of the 1987 Amendments to the OAA. If AoA did not collect the program data herein requested, it would not be able to monitor and manage total program progress as expected, nor develop program policy options directed toward assuring the most effective use of limited Title VI funds.

3. Use of Improved Information Technology and Burden Reduction

A web based reporting system is in place reducing the cost of mailing reports to AoA and ensuring that reports are received in a timely manner. However, due to the geographical location and size of some Tribal grantees, paper reports are also accepted.

4. Efforts to Identify Duplication and Use of Similar Information

Title VI funds are used to provide specific services to distinct target populations, American Indian and Alaskan Native elderly living on or near reservations; Native Hawaiians and Caregivers caring for American Indian, Alaskan Native elderly living on or near reservations and Hawaiian elders. Other federal programs may provide some services to some of the American Indians and Native Hawaiians and Caregivers but they do not generate data specifically about services provided by the Title VI programs.

No similar information is available.

5. Impact on Small Businesses or Other Small Entities

OAA Title VI grantees are Tribal organizations representing tribal governments; therefore, we view them as local government entities.

6. Consequences of Collecting the Information Less Frequently

Annual reporting allows Tribes to analyze their actual performance against their originally stated goals and objectives. ACL carefully monitors the reports to determine accuracy of reported information and contacts grantees to discuss any questionable responses. This approach offers an opportunity for training, technical assistance and monitoring.

7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5

Increased frequency of reporting is initiated as part of negative audit findings. Programs can be put on restriction when they must report monthly to ACL prior to our releasing funds.

8. Comments in Response to the Federal Register Notice and Efforts to Consult Outside the Agency

A 60 day public comment period for the information collection was provided through notification in the Federal Register Notice published Wednesday, April, 2015 (Volume 80, No. 72).

No comments were received from the 60-day Notice.

9. Explanation of Any Payment or Gift to Respondents

No payments, gifts to respondents or other remunerations of contractors or grantees have been provided.

10. Assurance of Confidentiality Provided to Respondents

No assurances are made by AoA to the respondents regarding confidential use of information supplied in the Program Performance Report. Individuals are not identified in the report.

The Title VI Part A grantees assure confidentiality to individuals as required by 45 CFR 1326.7.

The Title VI Part B grantees assure confidentiality to individuals as required by 45 CFR 1328.7.

11. Justification for Sensitive Questions

The report does not include questions of a sensitive nature.

12. Estimates of Annualized Burden Hours and Costs

GOVERNMENT BURDEN HOURS ESTIMATE	HOURS
Dissemination of report instructions to field	16.0
Regional office review of reports from Title VI grantees, and consultation with Grantees (1 hour per annual report for 263 grantees)	263
Central office analysis and compilation of report for dissemination	<u>100</u>
Dissemination of report of nationwide program	30
TOTAL FEDERAL GOVERNMENT HOURS	409.0
RESPONDENT BURDEN HOURS ESTIMATE	
2.5 hours per grantee (263 grantees) for one report each year	657.5

13. Estimates of Other Total Annual Cost Burden to Respondents and Record Keepers

Offset and mailing close estimated as 9 pages, 263 copies (first issuance only) 2367 page at 10 cents per page) (2394 pages at 10 cents per page) = \$236.70

14. Annualized Cost to the Federal Government

GOVERNMENT BURDEN COST ESTIMATE	DOLLAR
409.0 hours (average grade of staff: GS 12, step 1 - \$35.88	\$15,302.82
RESPONDENT BURDEN COST ESTIMATE	
2.5 hours at an average of \$11.75 per hours	\$7725.63

15. Explanation for Program Changes or Adjustments

When the OMB approval for the report form was last sought in 2012, there were 256 Title VI grantees. In 2014 that number increased to 263.

In FY2011 we published a Federal Register announcement inviting current grantees and new applicants to apply for Title VI funds for a 3 year project period. Based on this announcement we are now funding 263 Title VI grantees – an increase of 7 grantees from the previous project period. Hence, the increase in numbers in this report, as well as, the number of new Title VI directors responsible for collecting data and completing the report for the first time.

16. Plans for Tabulation and Publication and Project Time Schedule

Reports are due annually on June 30th. AoA submits an annual report to Congress and the reporting data is included in that report.

17. Reason(s) Display of OMB Expiration Date is Inappropriate

There is no reason display of OMB expiration date would be inappropriate.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

There are no exceptions to certification for paperwork reduction act submissions.